

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

USDC SDNY  
DOCUMENT  
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DOC #:  
DATE FILED: 4/11/2014

KEVIN MAHER, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

BANK OF NOVA SCOTIA, *et al.*,

Defendants.

No. 14 Civ. 1459 (VEC)

RICHARD WHITE, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

THE BANK OF NOVA SCOTIA, *et al.*,

Defendants.

No. 14 Civ. 1634 (VEC)

PETER DENIGRIS, on behalf of himself and  
all others similarly situated,

Plaintiff,

v.

BANK OF NOVA SCOTIA, *et al.*,

Defendants.

No. 14 Civ. 1638 (VEC)

AIS CAPITAL MANAGEMENT, L.P., on  
behalf of itself and all others similarly situated,

Plaintiff,

v.

BANK OF NOVA SCOTIA, *et al.*,

Defendants.

No. 14 Civ. 1642 (VEC)

ERIC NALVEN, individually and on behalf of  
all those similarly situated,

Plaintiff,

v.

<p>THE LONDON GOLD MARKET FIXING LTD., <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	No. 14 Civ. 1644 (VEC)
<p>WHITE OAK FUND LP, on behalf of itself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p>	No. 14 Civ. 1701 (VEC)
<p>BARCLAYS BANK PLC, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	
<p>J. SCOTT NICHOLSON, on behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p>	No. 14 Civ. 1707 (VEC)
<p>THE BANK OF NOVA SCOTIA, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	
<p>OLIVER BARKER, on behalf of himself and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p>	No. 14 Civ. 1964 (VEC)
<p>BANK OF NOVA SCOTIA, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	
<p>AMERICAN PRECIOUS METALS, LTD., and STEVE E. SUMMER, on behalf of themselves and all others similarly situated,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p>	No. 14 Civ. 2102 (VEC)
<p>BANK OF NOVA SCOTIA, <i>et al.</i>,</p> <p style="text-align: center;">Defendants.</p>	
<p>ROBERT L. TEEL, on behalf of himself and all others similarly situated,</p>	

<div>Plaintiff,</div> <div>v.</div> <div>BANK OF NOVA SCOTIA, <i>et al.</i>,</div> <div>Defendants.</div>	No. 14 Civ. 2108 (VEC)
<div>A. HARRY LAMBORN, on behalf of himself and all others similarly situated,</div> <div>Plaintiff,</div> <div>v.</div> <div>BANK OF NOVA SCOTIA, <i>et al.</i>,</div> <div>Defendants.</div>	No. 14 Civ. 2134 (VEC)
<div>CHRISTOPHER DEPAOLI, on behalf of themselves and all others similarly situated,</div> <div>Plaintiff,</div> <div>v.</div> <div>THE BANK OF NOVA SCOTIA, <i>et al.</i>,</div> <div>Defendants.</div>	No. 14 Civ. 2124 (VEC)

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, Plaintiffs filed the above-captioned actions in March and April 2014;

WHEREAS, certain Plaintiffs purport to have served certain Defendants with the complaint;

WHEREAS, Defendants have not accepted service of the complaints and expressly reserve all of their rights and defenses, including sufficiency of process and lack of personal jurisdiction;

WHEREAS, the parties expect these actions, and other similar actions, will be the subject of a motion to consolidate;

WHEREAS, for the sake of efficiency and good order, the parties wish to permit sufficient time for consolidation before the Defendants are required to answer, move or otherwise respond to the complaints;

IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel, that the time for Defendants to respond to the complaints is suspended until such time as these actions, and other related actions, have been consolidated, and a schedule has been set for a consolidated amended complaint and Defendants' response thereto. However, notwithstanding any other provision set forth herein, if any of the below stipulating Defendants answer, move, or otherwise plead in response to any complaint filed in any other related action now pending or as may be subsequently filed in, or removed to, federal court, asserting related or similar claims as made in the above captioned actions before the response date contemplated by this Stipulation, then the parties to this Stipulation shall promptly meet and confer within five (5) calendar days concerning the schedule for Defendants to respond to the complaints herein. If and to the extent that the parties fail to reach an agreement concerning the schedule for Defendants to respond to the complaints herein, then any Plaintiff may withdraw from this Stipulation subject to reasonable notice to Defendants. In such event, the withdrawing Plaintiff and Defendants shall revert to their respective positions prior to the date of this Stipulation as if no extension had been given with respect to the withdrawing Plaintiff's complaint, except that Defendants' time to respond shall be at least forty-five (45) days from the date when Defendants are notified of Plaintiff's withdrawal from this Stipulation. Defendant(s) may seek, and the withdrawing Plaintiff may oppose, a further suspension of the time to respond to the withdrawing Plaintiff's complaint.

Dated: April 11, 2014  
New York, New York



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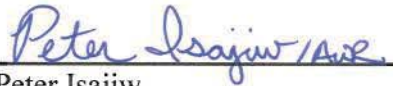
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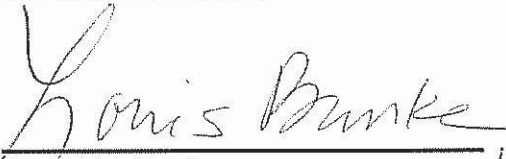
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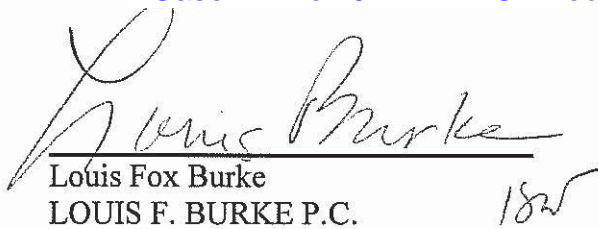
  

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**IT IS SO ORDERED.**

Dated: April \_\_, 2014  
New York, New York

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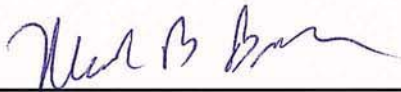
United States District Judge



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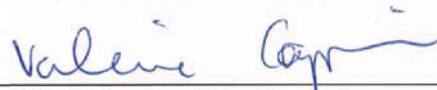
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**IT IS SO ORDERED.**

Dated: April 11, 2014  
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United States District Judge